

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED  
JOHN P. HERMAN  
CLERK

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM CASARES (1)

DONALD LIPP (2)

FREDERICK JORDAN III (3)

MARCELINO RODRIGUEZ (4)

JEREMY LIPP (5)

KELLY HARRISON (6),

Defendants.

CASE NO. 1:13-cr-024

JUDGE BARRETT

SUPERSEDING INDICTMENT

18 U.S.C. § 2

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

21 U.S.C. § 853

THE GRAND JURY CHARGES THAT:

COUNT 1

Beginning approximately on or about July 1, 2002, and continuing up to and including January 4, 2013, the exact dates being unknown, within the Southern District of Ohio, and elsewhere, the defendants, **ADAM CASARES, DONALD LIPP, FREDERICK JORDAN III, MARCELINO RODRIGUEZ, JEREMY LEGG, and KELLY HARRISON** along with others known and unknown to the Grand Jury, did knowingly, willfully, intentionally, and unlawfully combine, conspire, confederate, and agree, and have a tacit understanding with each other, to commit offenses against the United States, to wit: to knowingly, willfully, intentionally and unlawfully possess with the intent to distribute a measurable amount of a Schedule I controlled substance, to wit: marijuana in violation of 21 U.S.C. § 841(a)(1).

**MANNER AND MEANS OF THE CONSPIRACY**

It was part of the conspiracy that the defendants, **FREDERICK JORDAN III**, **JEREMY LEGG** and **ADAM CASARES** would receive marijuana in Portsmouth, Ohio from a location in Donna, Texas with the intent to distribute the marijuana in the Portsmouth, Ohio area.

It was further part of the conspiracy that **DONALD LIPP** would transport marijuana from Texas to **ADAM CASARES**, **JEREMY LEGG**, and **FREDERICK JORDAN III** to Portsmouth, Ohio.

It was further part of the conspiracy that the defendant, **GEORGE BAKER** would transport marijuana from Texas to **ADAM CASARES**, **MARCELINO RODRIGUEZ**, and **FREDERICK JORDAN III** to **JORDAN's** home located at 2233 Flatwood Fallen Timber Road., Lucasville, Ohio for the purpose of distribution.

It was further part of the conspiracy that **KELLY HARRISON** would obtain large portions of the marijuana shipments for resale. **HARRISON** would then pay **CASARES** for the marijuana from the proceeds of **HARRISON's** sale of the drugs.

**In violation of 21 U.S.C. § 846**

**COUNT 2**

Beginning on or about January 4, 2013, in the Southern District of Ohio, the defendants, **ADAM CASARES**, **FREDERICK JORDAN III**, **MARCELINO RODRIGUEZ**, and **KELLY HARRISON**, along with others known and unknown to the Grand Jury did knowingly and intentionally, possess with the intent to distribute a measurable amount of a Schedule I controlled substance to wit: marijuana.

**In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2**

**FORFEITURE ALLEGATION 1**

Upon conviction of the offenses in violation of 21 U.S.C. §§ 841 and 846 as set forth in this Indictment, the defendants, **ADAM CASARES, FREDERICK JORDAN III, MARCELINO RODRIGUEZ,** and **KELLY HARRISON** shall forfeit to the United States pursuant to 21 U.S.C. § 853(a): (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation; including, but not limited to the following: **\$216,030.00 in U.S. Currency.**

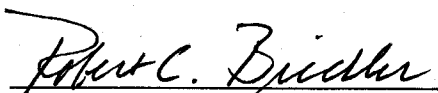
**Substitute Assets**

If any of the property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States shall be entitled to the forfeiture of substitute property pursuant to Title 21 U.S.C. § 853(p).

**A TRUE BILL.**

  
**GRAND JURY FOREPERSON**

**CARTER M. STEWART  
UNITED STATES ATTORNEY**

  
**ROBERT C. BRICHLER  
OCDETF CHIEF SOUTHERN DISTRICT OF OHIO**